

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                      |   |              |
|----------------------|---|--------------|
| In Re:               | : | 16-04101-RNO |
|                      | : |              |
| ERICK JOHNSON and    | : |              |
| CARMEN KITTS JOHNSON | : |              |
|                      | : |              |
| Debtors              | : | Chapter 13   |
|                      | : |              |
| ERICK JOHNSON and    | : |              |
| CARMEN KITTS JOHNSON | : |              |
| Movants              | : |              |

**NOTICE OF DEBTORS' MOTION FOR APPROVAL TO INCUR SECURED DEBT**

**NOTICE IS HEREBY GIVEN THAT:**

The Debtors have applied to the Court seeking authority to incur secured debt to purchase a Toyota Camry, with a loan amount not to exceed \$18,000, an interest rate of 15.99%, a term of 72 months, and a monthly payment of \$392.92.

Anyone wishing to object to the Motion to Incur Secured Debt must do so in writing. Any objection shall be in accordance with the Federal Rules of Bankruptcy Procedure, must set forth specifically the basis for such objection, and must be filed with the Clerk of the United States Bankruptcy Court at the address set forth below **on or before August 18, 2017**. The objecting party shall appear at the hearing on this Motion.

A copy of any objection to the Motion must be served on Debtor's counsel, Dawn Cutaia, Cutaia Law, LLC 115 E. Philadelphia Street, York, PA 17401, such that she has receipt of such objection **on or before August 18, 2017**.

If an objection is filed, a hearing may be held by the Court on **August 24<sup>th</sup> 2017 at 10:00 a.m.** in the Bankruptcy Courtroom, Ronald Reagan Federal Building, 228 Walnut Street, Harrisburg, Pennsylvania 17101. Copies of all documents filed in connection with this matter are available for inspection at the Clerk's office located on the Third Floor of the Federal Building, Third and Walnut Street, Harrisburg, Pennsylvania.

CLERK UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
THE RONALD REAGAN FEDERAL BUILDING  
228 WALNUT STREET, ROOM 320  
HARRISBURG, PA 17108

**DATE OF NOTICE: AUGUST 11 2017**